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Hon. Naomi Reice Buchwald, U.S.D.J.
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2270
New York, NY 10007-1312

Re: Conopco, Inc. d/b/a Unilever v. Wells Enterprises, Inc.
(Case No. 14 Civ. 2223-NRB-RLE)

Dear Judge Buchwald:

This firm represents Defendant-Counterclaim Plaintiff Wells Enterprises, Inc. ("Wells") in the above-captioned matter. We note that Plaintiff-Counterclaim Defendant filed a letter requesting a pre-motion conference (Dkt. 18) on the same date that it filed its Motion to Dismiss Counterclaims (Dkt. 16) and supporting Memorandum of Law (Dkt. 17) (the "Motion"). Your Honor's Individual Practices, paragraph 2B, requires that "[f]or motions other than discovery motions, a pre-motion conference is required before making any motion," except for certain circumstances, none of which apply here.

Accordingly, we write to request guidance from the Court as to whether the Court will hold a pre-motion conference with respect to the Motion and whether Defendant-Counterclaim Plaintiff is to file its opposition to the Motion within the time required by the Federal Rules of Civil Procedure, or alternatively to file an opposition after the Court has held the pre-motion conference.

Thank you for your consideration.

Respectfully submitted,



Beth Goldman, Esq.